

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

| | | |
|-------------------------|---|------------------------|
| IN RE: | : | Chapter 13 Proceeding |
| LOIS M. SMITH | : | Case No. 1:13-bk-04105 |
| Debtor | : | |
| | : | |
| V | : | |
| | : | |
| JPMORGAN, CHASE BANK NA | : | |
| Respondent | : | |
| | : | |
| LOIS M. SMITH | : | |
| Movant | : | |

AMENDED MOTION TO SELL REAL ESTATE

AND NOW comes the debtor, Lois M. Smith, by and through her attorney, James H. Turner, Esquire, and petitions the Court as follows:

1. Debtor filed a Chapter 13 Bankruptcy docketed to the above number on August 8, 2013.
3. Debtor is the owner of property located at 1965 Limestone Drive, Hummelstown, Pennsylvania.
4. Debtors have a sales agreement for the property with Berkshire Hathaway Homsale Realty. in the amount of \$249,900.
5. Debtor is moving and must sell her property.

6. Debtor will give proceeds of sale to the mortgage company in satisfaction of their loan.

WHEREFORE, debtor requests your honorable Court enter an order approving the sale of debtor's property situate at 1965 Limestone Drive, Hummelstown, Pennsylvania.

Respectfully submitted,

Date: September 27, 2017

/s/ James H. Turner, Esquire
James H. Turner
Turner and O'Connell
4701 North Front Street
Harrisburg, PA 17110

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CERTIFICATE OF SERVICE

I, James H. Turner, Esquire, hereby certify that I served a true and correct copy of the Notice to the following:

See Attached

Date: 9/27/17

/s/ James H. Turner, Esquire
James H. Turner
Turner and O'Connell
4701 North Front Street
Harrisburg, PA 17110
(717) 232-4551

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ORDER TO SELL PROPERTY

Upon consideration of the foregoing Motion to Sell Property it is hereby ordered and decreed that Debtor is authorized to sell property in accordance with the terms set forth in the Debtor's motion.

BY THE COURT: